

December 15, 2010

The Honorable Mary Nichols, Chair California Air Resources Board

RE: We Can't Clear-cut Our Way Out of Climate Change!

Dear Ms. Nichols and members of the California Air Resources Board:

Forests Forever has signed onto a letter to the ARB outlining the reasons for our opposition to the forest protocol you are considering adopting at your December meeting. But Forests Forever thinks it's crucial that a couple of its points be repeated.

We strongly urge the ARB to eliminate from the offset program the clearcutting of our forests as a way of sequestering carbon and to add provisions to assure that forest projects <u>do not</u> result in the conversion of naturally managed (uneven aged forests) into clear-cut plantations.

California's working timberlands are also important for the ecological services they provide, not only for nature, habitat and wildlife, but for people too. <u>Our forests are the lungs of the earth that purify our air.</u> Our forests control sedimentation and temperature of the waters we drink, and on which our salmon depend for reproduction. Even-aged, clear-cut forests are less resilient, more prone to fire and disease, and provide less diversity of habitat for the species on which nature depends.

Not all offsets are created equal. This is a novel program and the accounting issues are complicated. We should <u>adopt</u> only programs that will <u>most reliably</u> assure actual sequestration and <u>avoid</u> those that ignore carbon impacts of entire components of the activity seeking to be called an "offset" such as clear cuts. We should particularly avoid subsidizing clear cuts because they are extremely difficult to assure additionality, and they also pose big environmental risks.

Thank you for your attention to this letter.

Sincerely,

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